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October 9, 2018

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Room TW-B204  
Washington, DC 20554

Re: *Securus Technologies Inc. and Inmate Calling Solutions, LLC,  
Consolidated Applications for Consent to the Transfer of Control of  
Licenses and Authorizations, WC Docket No. 18-193*

Dear Ms. Dortch:

At the request of Commission staff, Inmate Calling Solutions, LLC d/b/a ICSolutions (“ICS”) has provided to the Commission’s E-Discovery vendor replacement copies of certain documents previously produced in response to the Wireline Competition Bureau’s Information and Document request (“Information Request”) dated September 11, 2018 in connection with the above-referenced transaction and in accordance with the Protective Order in this docket (the “Document Production”).<sup>1</sup> Specifically, ICS has resubmitted the following to the E-Discovery vendor via its secure FTP site:<sup>2</sup>

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<sup>1</sup> *Securus Technologies Inc., and Inmate Calling Solutions, LLC, Consolidated Applications for Consent to the Transfer of Control of Licenses and Authorizations*, Protective Order, WC Docket No. 18-193, DA No. 18-938 (rel. Sept. 11, 2018) (“Protective Order”).

<sup>2</sup> The documents, which contain information that meets the requirements for treatment as “Confidential” or “Highly Confidential,” were produced pursuant to the staff’s instructions and the procedures established in the Protective Order and in the Information Request. Consistent with the Protective Order, *id.* at ¶ 3, ICS obtained written approval from Commission staff to designate certain material as Highly Confidential. Pursuant to discussions with staff, the provided documents, unless specifically reviewed and downgraded, have been classified as “Highly Confidential.” Notwithstanding this default classification, ICS is not asserting Highly Confidential status for any documents that have been publicly

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- The documents on a disc labeled ICS005, originally submitted October 1, 2018;
- The documents on a disc labeled ICS006, originally submitted October 3, 2018;  
and
- The documents on a disc labeled ICS007, originally submitted October 3, 2018.

ICS has made diligent efforts to ensure that none of the submitted material is privileged under the attorney-client privilege or attorney work product doctrine. To the extent that any privileged materials may have been inadvertently produced, such production does not constitute a waiver of any applicable privilege. ICS requests that any privileged materials inadvertently produced be returned to ICS as soon as such inadvertent production is discovered by any party, and reserves all rights to seek return of any such documents.

If you have any questions arise concerning this submission, please contact the undersigned.

Very truly yours,

/s/ Howard M. Liberman

Howard M. Liberman  
*Counsel to Inmate Calling Solutions, LLC*  
*d/b/a ICSolutions*

cc: Jodie May  
Michael Ray  
Dennis Johnson